



A Subsidiary of W. R. Grace & Co.  
Memphis, Tennessee

# Remedium MEMO

September 20, 2004

TO: R. J. Medler

FROM: R. R. Marriam

RE: MEETING TO DISCUSS FLYWAY SITE  
RESTORATION REQUIREMENTS

cc: Courtney Zamora – Volpe Paul Opem - CDM  
Paul Lammers – CDM Alan R. Stringer - Grace  
Jim Christiansen – EPA Bill E. Miller – Remedium

A meeting was held in the Libby EPA Information offices on Thursday, September 16, 2004, to discuss the site restoration requirements of the Flyway Site near Libby, MT. Those attending were:

Courtney Zamora, Site Manager  
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Topics discussed are:

1. Use of the gravel from the Plum Creek Timber Co. pit in Libby, Mt.

Ms. Zamora reported that EPA had tested the material from this pit and found it to be satisfactory. EPA has contracted for 10,000 yards of the gravel and has used about 5,000 yards. It is expected that W. R. Grace & Co. would use gravel from the remaining 5,000 yards. It is our understanding that Grace must also provide the means of loading the gravel into the transporting trucks.

2. Status of the two piles of river run gravel and soil on the Flyway Site.

It is understood that these piles were placed on the site by EPA contractors. Both of these piles have been analyzed by EPA and are acceptable for use on the Flyway Site as backfill material. It will not be necessary for W. R. Grace & Co./Remedium to resample or analyze these stockpiled materials.

3. Review of site Restoration Section of the Removal Action Work Plan for the Libby, MT Flyway Site.

Copies of the pertinent section of the Removal Action Work Plan involves the Flyway Final Site Restoration (attached page 3-2) and the E-mail from Jim Christiansen (dated August 17, 2004) were discussed.

4. EPA requirements for site restoration

After some discussion the following guidelines were provided to W. R. Grace & Co./Remedium

- a. There is not a strict one for one replacement requirement for soils excavated from the site.
- b. Areas excavated with residual asbestos analytical results showing less than 1% asbestos in the remaining soil would require a minimum of 18" of backfill material.
- c. Where the riverbanks were cut back to improve the slope, these portions will not be extensively backfilled.
- d. Recontouring, taking into account proper drainage will be undertaken so that low places are not left on the site.

- e. All restoration actually will work from cleaned areas and avoid having equipment move on areas containing less than 1% asbestos.
5. Air sampling during the restoration work
- a. Perimeter air sampling will not be required.
  - b. Personal air sampling will be conducted 2 times per week on 2 workers.
  - c. Paul Opem will conduct these sampling events.
  - d. W. R. Grace & Co./Remedium will pay for the analysis and report results to CDM as usual.



R. R. Marriam

jm  
Attach.

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### **3.1.6 Confirmatory Soil Sampling**

Confirmatory Soil Sampling as outlined in the Sampling and Analysis Plan (see Appendix C for the SAP) will be conducted in 2004.

### **3.1.7 Erosion Control**

An Erosion Control Plan was developed by Remedium (see Appendix E). This plan will be followed for activities to be implemented in 2004.

### **3.1.8 Final Site Restoration**

The Flyway site will be restored to a condition similar to what existed prior to soil removal activities. Restoration of the Flyway site includes placing gravel (which will be the onsite stock piled material) in the excavated areas to the approximate original contours. Prior to the use of this gravel, the quality of the gravel will be determined. If the quality of the gravel has not been previously sampled to assure its quality, the gravel will be sampled and its quality determined before use.

The Riverbank if impacted will be restored using rip-rap material located onsite. As above, the quality of the rip-rap will be determined before use.

## **3.2 Removal Activities**

### **3.2.1 Contractor Mobilization**

Contractor mobilization, including decontamination and lavatory facilities shall be similar to those provided in the 2001 construction season. Mobilization shall begin upon notice to proceed by the USEPA (Region VIII) remedial project manager and RAWP approval.

### **3.2.2 Temporary Facilities**

Temporary facilities will include office trailers for project management and the field crew. A trailer will be equipped with the same requirements (telephone, heating, air conditioning, lighting, and ventilation systems, etc.) as described in the Flyway Property Final Removal Action Work Plan,

**/O=DOT/OU=VNTSCEX/CN=RECIPIENTS/CN=ZAMORA**

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**From:** Christiansen.Jim@epamail.epa.gov  
**Sent:** Tuesday, August 17, 2004 12:07 PM  
**To:** Robert.R.Marriam@grace.com  
**Cc:** zamora@volpe.dot.gov  
**Subject:** PROGRESS REPORT #5 - LIBBY FLYWAY SITE

**Importance:** High

Bob -

Thank you. A couple points for you. (1) Courtney let me know that Grace did not plan to place any cover on the excavated grids at the Flyway. I was unaware of this change, either because I missed it or wasn't informed. Either way, it is not acceptable to EPA. The approved work plan states in Section 3.1.8 that restoration "includes placing gravel in the excavated areas to the approximate original contours." Section 3.2.9 states that backfill material will meet requirements set forth in our original workplan. Either way, it clearly states that backfilling will occur. I'm not expecting topsoil and extensive reveg (as it states in Sec 3.2.10, it is Grace's property, but I do expect that the excavated areas be covered with clean material to some degree (not necessarily 18 inches) and the original contours be approximately restored. Erosion must be controlled. This isn't because I want simply to stick to the work plan, though that is important, but rather because our clearance sampling protocol is prefaced on samples being collected at depth - having soil or gravel cover helps compensate for the uncertainty of PLM analysis. I can discuss this with you if you need to, and would be willing to be flexible on areas we scraped where there was no indication or evidence of contamination at depth, but not in other locations. Please work out a plan with the EPA field team. (2) Bill Miller inquired about the possibility of "capping" the grids along the river bank. I told him I would consider it. I have, and again, I'm going to have to say no. That wasn't in the work plan, and it is a clear deviation from the general excavation approach. While I understand your rationale and its consistency with our approach on excavation clearance, I am concerned with the engineering aspects of raised grid, as well as public perception and impacts it may have on future Grace work.

Thanks.  
Jim

Robert.R.Marriam@ grace.com	To: Jim
Christiansen/EPR/R8/USEPA/US@EPA	cc: William.Corcoran@grace.com,
Robert.Emmett@grace.com, Richard.Finke@grace.com,	Jay.Hughes@grace.com,
08/17/2004 12:18	Alan.R.Stringer@grace.com
Robert.J.Medler@grace.com, Bill.E.Miller@grace.com,	Subject: PROGRESS REPORT #5 - LIBBY FLYWAY
PM	
SITE	

Jim:

19 grids (whole or partial) have been excavated and clear by analysis. Approximately 8850 yards of soil have been hauled to the mine site. In order to prevent dust from migrating from the excavated sites, straw has

been added as a cover on these grids. An automatic data logger has been installed on the weather station located in the project trailer onsite.

All residual soil samples which have been analyzed are being packaged for shipment to the BMSL storage facilities in Westmont, NJ for archiving.

Cooperation with EPA and EPA contractors has been excellent. Assistance given to Grace by the EPA contractors is greatly appreciated.

Bob Marriam  
(See attached file: WINMAIL.DAT)